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*Attorneys for Plaintiff Jobiak LLC*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

JOBIK, LLC., a Delaware  
Limited Liability Company;

Plaintiff,

vs.

BOTMAKERS LLC, d.b.a. TARTA.AI,  
a Delaware Limited Liability  
Company

Defendant.

Case No. 2:23-cv-08604-MEMF(MBKx)

**NOTICE OF PLAINTIFF JOBIK LLC'S  
INTENT NOT TO FILE AN AMENDED  
COMPLAINT**

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**  
2 **RECORD:**

3 PLEASE TAKE NOTICE that pursuant to the Court's Order dated March 24, 2025 (Dkt.  
4 37), which granted Plaintiff leave to conduct limited jurisdictional discovery and to file either an  
5 amended complaint or a notice of intent not to amend within ninety (90) days, Plaintiff Jobiak LLC  
6 respectfully submits this Notice of Intent Not to File an Amended Complaint.

7  
8 Since the Court's Order discharging the Order to Show Cause, Plaintiff has diligently  
9 conducted additional jurisdictional discovery efforts in order to assess whether amendment of the  
10 complaint could cure the jurisdictional deficiencies identified by the Court. These efforts included  
11 the issuance of additional discovery requests, a review of publicly available and third-party  
12 materials, and internal analysis of evidence relating to the location and manner of Defendant's  
13 conduct relevant to the claims previously asserted.

14  
15 After careful consideration of the factual record developed during this post-dismissal period  
16 and in consultation with counsel, Plaintiff has determined that it will not proceed with filing an  
17 amended complaint in this forum at this time. In light of the Court's prior findings regarding  
18 personal jurisdiction and the information presently available, Plaintiff believes that pursuing this  
19 matter in an alternative forum may be more appropriate.

20 Accordingly, Plaintiff notifies the Court and all parties that it does not intend to file an  
21 amended complaint in the Central District of California.

22  
23 Plaintiff expressly reserves all rights and remedies available to it under applicable law,  
24 including the right to initiate a new civil action in another forum with proper jurisdiction, including  
25 but not limited to the jurisdiction in which Defendant Botmakers LLC is incorporated and  
26 principally operates.

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DATED: June 23, 2025

Respectfully submitted,

**OMNI LEGAL GROUP**

By: /s/ Omid E. Khalifeh  
Omid E. Khalifeh  
*Attorneys for Plaintiff*